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Creditor and Real Party in Interest
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12 UNITED STATES BANKRUPTCY COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SANTA ROSA DIVISION
15

16 In re:

17 FLOYD E. SQUIRES III AND
18 BETTY J. SQUIRES,
19 Debtors.
20

CASE No. 17-10828 WJL 11

Chapter 11

**DECLARATION OF HEINRICH
SOLTOW IN SUPPORT OF CITY OF
EUREKA'S MOTION TO APPOINT
CHAPTER 11 TRUSTEE**

21 Date: March 26, 2018
Time: 9:00 a.m.
22 Judge: Hon. William Lafferty
Location: U.S. Courthouse
3140 Boeing Avenue
23 McKinleyville, CA

24 I, Heinrich Soltow, declare as follows:

25 1. I am currently employed as a Police Officer for the Police Department of the City of
26 Eureka ("City"), and have been so employed at all times relevant to this Declaration. I have been
27 employed as a Police Officer for the City for just over three years. If called upon to testify, I could
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1 and would testify competently to the contents of this declaration. I make this declaration in support
2 of the Trustee's Motion To Appoint a Chapter 11 Trustee (the "Motion").

3 2. I have worked as a Police Officer for the City of Eureka for the past 3 years. In the
4 course of my experience as a Police Officer working at the City I have dealt with numerous issues at
5 properties owned by Floyd and Betty Squires ("Squires"). I have been dispatched to incidents at var-
6 ious Squires' properties approximately 100 times in the last 3 years.

7 3. Notably, on August 21, 2017, at about 2:55 p.m. I responded to a structure fire at the
8 Blue Herron Motel (located at 2245 Broadway) ("Blue Heron").

9 4. Based on my investigation (detailed in Exhibit A), I concluded that Kattie Yocum
10 ("Yocum") started the fire at the Blue Heron as revenge against Floyd Squires, the owner of the Blue
11 Heron.

12 5. I arrested Yocum for arson (Pen. Code § 452(c)) and violation of parole (Pen. Code §
13 1203.2(a)). I am informed and believe that Yocum was eventually charged with arson and thereafter
14 pleaded no contest to the same.

15 6. Attached hereto as Exhibit A is a true and correct copy of my police report detailing
16 my investigation of this incident (with attachments referenced therein). I prepared Exhibit A at or
17 near the time of the events described. Exhibit A was kept in the regular course of the operations of
18 the City Police Department. The making of Exhibit A (a police report) is the regular practice of the
19 Police Department following an arrest. Furthermore, Exhibit A sets out my activities with respect to
20 the investigation.


21 7. Most recently, on February 19, 2018, at about 8:38 p.m. I responded to assist other of-
22 ficers on scene to a call of a rape in progress at 117 5th Street. While on scene, I discovered Floyd
23 Squires owns 117 5th Street. The property had been partially boarded up and was supposed to be
24 vacant. During the investigation it was discovered that two individuals, a male and a female, had
25 entered to the property, and once inside a disturbance occurred. During the disturbance the female
26 broke a window. Both individuals were taken into custody and booked for violation of Penal Code
27 §§ 647(e) (unlawful lodging) and 647(f) (public intoxication).

1 8. A request was made through dispatch to contact Squires to secure 117 5th Street. The
2 property was no longer secure due to the broken window. Dispatch was not able to reach Squires to
3 secure the property.

4 9. During my various responses to Squires owned properties throughout the City there
5 were several incidents where Squires owned property had been broken into and left unsecured, in-
6 cluding several at the Blue Heron Motel prior to its demolition. During several instances Squires
7 failed to respond to secure his properties.

8 I declare under penalty of perjury under the laws of the United States that the above statements
9 are true and correct, and with respect to those matters stated on information and belief, I believe them
10 to be true and correct.

11 Dated: February 23, 2018.


Heinrich Soltow
Officer, Police Department
City of Eureka

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